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Attorneys for Intervenor Hydrodynamics, Inc.

DEPARTMENT OF PUBLIC SERVICE REGULATION
BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MONTANA

IN THE MATTER OF the Application of)	
NorthWestern Energy for Approval to)	
Purchase and Operate the Hydroelectric)	REGULATORY DIVISION
Facilities of PPL Montana, LLC, to)	
Include Generation Assets Cost of Service)	DOCKET NO. D2013.12.85
in Electricity Supply Rates, to Issue)	
Securities to Complete the Purchase, and)	
for Related Relief)	

HYDRODYNAMICS, INC. PETITION FOR GENERAL INTERVENTION

I. INTRODUCTION.

Hydrodynamics, Inc. ("Hydrodynamics"), acting by and through its undersigned counsel, hereby petitions the Montana Public Service Commission ("Commission") for general intervention in the above-captioned matter. The basis for Hydrodynamics' intervention is that Hydrodynamics is the developer of small hydroelectric generation projects in Montana and both presently sells and intends to sell electric generation to NorthWestern Energy ("NWE"). The Commission's consideration of this acquisition of a large number of hydroelectric generation resources will have a substantial effect on NWE's

resource acquisition decisions, its avoided costs, and its ability to integrate generation on its system. As the PPL Montana, LLC hydroelectric resources that NWE intends to acquire are similar to the sorts of hydroelectric resources that are developed by Hydrodynamics, Hydrodynamics believes the future price that it is paid for its generation, as well as the costs for receiving electric service from NWE, including backup power from NorthWestern, may be in part determined or effected by the Commission's final order in this Docket.

II. SERVICE.

Please send all documents related to this matter to Hydrodynamics' counsel as follows:

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Please send all documents related to this matter to Hydrodynamics as follows:

Roger Kirk/Ben Singer
Hydrodynamics, Inc.
521 E. Peach, Suite 2B
Bozeman, MT 59715
Telephone: (406) 587-5086
E-mail: bensinger@hydrodynamics.biz

III. ISSUES.

The approval of NWE's acquisition of PPL Montana, LLC's hydroelectric generation assets may have a substantial effect on NWE's resource acquisition plans, its avoided cost, and the cost to provide electric service to Hydrodynamics' projects. Hydrodynamics is a seller and potential seller of hydroelectric generation to NWE. Hydrodynamics is also a ratepayer and has a substantial interest in ensuring NWE's rates are based on appropriate cost plus considerations

and appropriate resource acquisition decisions.

IV. POSITIONS.

Hydrodynamics does not yet have sufficient information to know whether it will oppose NWE's acquisition of the PPL Montana, LLC hydroelectric generation assets. In general terms, Hydrodynamics will take the position that the Commission's decision whether to approve NWE's acquisition of PPL Montana, LLC's hydroelectric generating resources must be based on substantial evidence and a consideration of appropriate factors, and that such acquisition must not violate any Montana law. Hydrodynamics will also intervene to ensure that the Commission's decision is consistent with the Public Utility Regulatory Policies Act of 1978 ("PURPA"), 16 U.S.C. § 824a-3, Montana's "Mini-PURPA"), M.C.A. §§ 69-3-601 through 604, and the Commission's rules implementing federal PURPA, A.R.M. §§ 38.5.1901 through 1908. Hydrodynamics will also intervene as a ratepayer to ensure that the rates it pays are just and reasonable according to law.

V. CONCLUSION.

For the above-stated reasons, Hydrodynamics respectfully requests general intervenor status in this docket.

RESPECTFULLY SUBMITTED this 10th day of January, 2014.

BY: UDA LAW FIRM, P.C.

Michael J. Uda
Attorney for Intervenor Hydrodynamics

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served, postage prepaid via first class U.S. mail on this 10th day of January, 2014, upon the following:

Al Brogan
NorthWestern Energy
208 North Montana, Suite 205
Helena, Montana 59601

Montana Consumer Counsel
P.O. Box 201703
Helena, MT 59620-1703

The foregoing was e-filed and the original was hand-delivered to the following:

Public Service Commission
1701 Prospect Ave.
P.O. Box 202601
Helena, MT 59620-2601

Cathleen N. Uda
Legal Secretary to Michael Uda